

McGREGOR W. SCOTT  
United States Attorney  
KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$106,590.00 IN U.S.  
CURRENCY,

Defendant.

2:20-MC-00311-WBS-CKD

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and claimant Adrian Ortega ("claimant"), by and through their respective counsel, as follows:

1. On September 29, 2020, the claimant filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$106,590.00 in U.S. Currency (hereafter "defendant currency"), which was seized on June 23, 2020.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
3 the parties. That deadline is December 18, 2020.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
5 extend to March 18, 2021, the time in which the United States is required to file a civil complaint for  
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
7 currency is subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be  
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
10 alleging that the defendant currency is subject to forfeiture shall be extended to March 18, 2021.

11 DATED: 12/16/2020

McGREGOR W. SCOTT  
United States Attorney

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14 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney


15  
16 DATED: 12/16/2020

/s/ Robert L. Forkner  
ROBERT L. FORKNER  
Attorney for claimant Adrian Ortega

(Authorized via email)

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20 IT IS SO ORDERED.

21 Dated: December 17, 2020

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE